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The Federal Communications Commission
Washington, D. C.
REF: RM-11306

Dear Commissioners,

Thank you for the opportunity to express comment on this very important issue regarding the Amateur Radio Service. The above referenced proposal has potential for far reaching negative implications for the Service for many reasons.

First, and most importantly, the filing organization, the ARRL, proclaims itself as representing the Amateur Radio Service. This organization, which has done great good for the Amateur Radio Community in years past, has lost touch with it's membership, and cannot possibly represent the entire Amateur Community, as its membership numbers consist of less than 30% of all licensed Amateur Radio operators in this country. This organization does not, in any manner, represent my views and opinions concerning the Amateur Radio Service.

The proposal as filed is filled with technical errors and assumptions. There has been no study as to the possible effects these changes in regulation will have upon the Amateur Radio Service. It is apparently addressing a vague need for additional spectrum for digital experimentation, although no specific examples are provided. In fact, the first draft of the proposal was written by an ad-hoc committee who's majority was comprised of amateurs with a major interest in a specific digital network designed only to provide free internet e-mail services over the amateur HF & MF frequencies. This segment of the amateur population is far less than 5% of all licensed U.S. amateur radio operators, but they insist on monopolizing the vast majority of allocated spectrum. This proposal, if it becomes law, would unjustly provide control of that spectrum to this small slice of the amateur population.

The most glaring flaw in the proposal is the verbiage that would allow “semi-automatic” digital operations wherever bandwidth permits. This method of initiation of communication is flawed, and simply does not work on the MF & HF bands due to the many effects of propagation on these frequencies. Automatic, or semi-automatic operations should be confined to specific segments of spectrum in much the same way as auto-forwarding packet radio has been for 2 decades. This method works very well, and has provided protection for the person to person style of communication that literally defines the nature and intent of the Amateur Radio Service.

I cannot disagree that there is a need to address allocation of additional spectrum for new digital modes to flourish. Experimentation with new modes has always been a trademark of amateur radio, and communications in all aspects have benefited from these activities. To address these needs, they first have to be identified, and their benefit realized. Studies must be performed to identify and address the implications such changes would have. The Amateur Radio Service is comprised of some 600,000 licensed amateurs, and the concerns of all licensed amateurs must be addressed. This proposal’s authors have failed to consider the concerns of the vast majority of amateurs in this country, and for that reason alone should be dropped from consideration.

I implore you to consider the needs and concerns of all amateurs in this matter, and to deny this proposal in its entirety. The authors have failed to illustrate how this will improve the service, and have failed to demonstrate that such changes are even necessary. The Amateur Radio Service has been a significant resource for this great country in years past by providing advancement in the art of radio communication, and invaluable assistance in times of emergency. Please allow us to continue our mission by not allowing a small special interest group to hinder and discourage the future of Amateur Radio.

Respectfully,
Luke O. Bannister, Jr.
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